

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

SEP 15 2014

David J. Bradley, Clerk

United States of America )  
Debbie V. Solis )  
YOB: 1987 Citizenship: USC )  
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Case No. M-14-1783-MDefendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 13, 2014 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841  
21 U.S.C. § 952

Possession with Intent to Distribute Heroin & Methamphetamine  
Illegal Importation of Heroin & Methamphetamine

This criminal complaint is based on these facts:

On September 13, 2014, Debbie SOLIS was detained while attempting to enter the United States through the Hidalgo, Texas Port of Entry with approximately 1.16 kilograms of heroin and 1.12 kilograms of methamphetamine concealed inside the car battery of the vehicle she was driving.

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.



Complainant's signature

Christopher Villarreal, U.S., HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 9/14/20144:08 pm

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter Ormsby

Printed name and title

Attachment "A"

On September 13, 2014, Homeland Security Investigations, McAllen, Texas (HSI McAllen) received information from Customs and Border Protection Office of Field Operations (CBP OFO) regarding an attempted narcotics smuggling event at the Hidalgo, Texas Port of Entry (Hidalgo POE). HSI McAllen special agents responded to the Hidalgo POE and initiated an investigation into the narcotics smuggling event.

Customs and Border Protection Officer (CBPO) Solis informed HSI special agents that a beige Chrysler Sebring displaying Texas license plate DWD 129 driven by Debbie SOLIS (SOLIS) attempted to make entry into the United States via the Hidalgo Port of Entry. CBPO Solis received a negative declaration for fruits, meats, plants, vegetables, alcohol, tobacco, firearms, ammunition, narcotics and currency in excess of \$10,000 from SOLIS. CBPO Solis noticed the vehicle had exited the United States (US) on Jun 25, 2014 and had not re-entered the US. CBPO Solis questioned SOLIS regarding her travel itinerary. In response to questioning, SOLIS stated that she exited the US in the vehicle earlier in the day (9/13/14) to visit the dentist and was returning from that trip. When CBPO Solis confronted SOLIS with the discrepancy in the vehicle crossing history, SOLIS stated that she walked across the bridge and did not drive the vehicle. SOLIS then stated that the vehicle she was driving belonged to a friend and she met people at a taqueria in Reynosa, MX where she picked up the vehicle. Based upon the inconsistent statements and vehicle crossing history, CBPO Solis referred the vehicle for a canine inspection.

During the canine inspection, CEO Meza noticed that his K-9 alerted to the possible odor of narcotics near front driver side fender area of the vehicle. CBPOs conducted an intrusive examination of the vehicle and noticed the vehicle's battery showed signs of tampering. An inspection focused on the battery of the vehicle resulted in the discovery of seven foreign bundles which, based upon CBPOs experience, appeared to be consistent with narcotics smuggling. The content of the bundles was probed and field tested. The field test yielded positive results for Methamphetamine on two bundles that contained a crystalline substance. The

remaining five bundles that contained a non-crystalline substance posited a positive field test for characteristics of heroin.

HSI Special Agent Villarreal and a CBPO presented SOLIS with ICE Form 73-025 (Declaration of Rights) in the English Language. SOLIS acknowledged verbally and in writing that she understood her rights prior to being interviewed. SOLIS waived her rights and agreed to provide information regarding the narcotic smuggling event. In response to questioning, SOLIS stated that she went to a pharmacy in Reynosa to receive a shot. While attempting to exit Mexico, SOLIS was approached by several males whom she had never met. The unknown males asked her to cross a vehicle in the United States in exchange for \$1,000 dollars. SOLIS stated that she needed the money to pay some outstanding bills so she agreed. The men, one of whom, she referred as "NINO" instructed her to drive the vehicle from Reynosa, MX to the Whataburger in Hidalgo, Texas. Once at the Whataburger, she was to park the vehicle and return several days later. Upon returning to the vehicle, she would be paid the previously arranged money. When asked who the vehicle belonged to, SOLIS stated "my friend Lilly MATA." When asked how individuals previously unknown to her were able to place her in a vehicle that belonged to a friend of SOLIS without any prior planning, SOLIS stated that she did not know the owner of the vehicle. When asked why she initially stated that the owner of the vehicle was a friend named "Lilly MATA" she stated that she does not want to get anybody in trouble. SOLIS then stopped responding to questioning and stated she wanted to talk to a lawyer. HSI immediately terminated the interview.

A uniformed CBPO then asked SOLIS to return to the holding cell. SOLIS refused verbally. CBPOs made a second verbal request for SOLIS to comply with his command. SOLIS said "make me." Additional CBPOs arrived in the interview area to ensure officer safety. An additional verbal command to return to the holding cell was given. SOLIS complied with the verbal command and returned to holding cell without further incident.

After HSI Special Agent presented the facts of the investigation to the Assistant United States Attorney's Office in the Southern District of Texas (AUSA), HSI seized the seven bundles of narcotics and took SOLIS into custody for violation of 21 USC 841 and 21 USC 952.